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PIXELS.COM, LLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

SID AVERY AND ASSOCIATES, INC. )  
d/b/a MPTV IMAGES, )  
Plaintiff, )  
v. )  
PIXELS.COM, LLC, )  
Defendant. )

Case No. 2:18-cv-10232-CJC(JEMx)

**DEFENDANT PIXELS.COM,  
LLC'S MOTION IN LIMINE TO  
EXCLUDE EXPERT BONNIE  
ROWAN**

DATE: October 26, 2020  
TIME: 3:00 p.m.  
JUDGE: The Honorable Cormac J.  
Carney  
Trial Date: November 3, 2020

**NOTICE OF MOTION AND MOTION**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, on October 26, 2020 at 3:00 p.m., at the parties' pretrial conference, Defendant Pixels.com, LLC will and hereby does submit this motion *in limine* for an order, pursuant to Federal Rules of Civil Procedure 26 and 37 and Federal Rule of Evidence 702, precluding Plaintiff Sid Avery and Associates, Inc. d/b/a MPTV Images from offering argument or eliciting evidence seeking to introduce the testimony of Ms. Bonnie Rowan as an expert witness at trial.

This motion is made following the meet and confer of counsel pursuant to L.R. 7-3, which took place on August 21, 2020.

This motion is based on this Notice of Motion and Motion and the Memorandum of Points and Authorities contained herein, the pleadings and papers on file in this action, and the argument of counsel present at the hearing on the motion.

DATED: August 28, 2020

McBRAYER PLLC

By: /s/ Bruce B. Paul

Bruce B. Paul  
Counsel for Defendant  
PIXELS.COM, LLC